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Cornelius, NC 28031
September 18, 2003

Federal Communications Commission
Washington, DC

Reference: On removing the requirement for Morse Code skills from the Amateur Radio Service

Gentlemen:

These comments relate to the value of Morse Code as an integral part of the Amateur Radio Service. Since its inception, the stated purpose and basis of the Amateur Radio service as defined in Part 97 of the FCC rules have been:

(a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.

(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

(c) Encouragement and improvement of the amateur radio service through rules which provide for advancing skills in both the communication and technical phases of the art.

(d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

(e) Continuation and extension of the amateur's unique ability to enhance international good will.

Of these five purposes, I feel retention of Morse Code is integral to three purposes--(a), (d), and (e). Allow me to elaborate on each of these points.

There are a number of situations where voice communications is problematic while Morse Code (CW) and other digital modes remains viable--geomagnetic storms being but one situation. For emergency communications, CW is the simplest, reliable form of communications that does not rely on additional hardware such as personal computers and/or digital decoders. In the direst of emergencies where power for such devices may be problematic, CW will stand as a mode requiring only a low power transceiver to get the message through. Admittedly, there are new modes of digital communications--CW is the earliest form of "digital" communications--developed by the Amateur Radio Service under goal (c), defined above. Yet, goal (d) has always set the Amateur Radio Service apart as one which requires attainment of certain skills to be able to proudly hold the licenses of more advanced operator classes. In a country where increasing mediocrity is the rule rather than the exception, we should not now accede the Amateur Radio Service to that standard, especially if in so doing we potentially jeopardize a cardinal goal of ensuring emergency communications.

There are some who would argue that relaxing the Morse Code requirement would actually add to the pool of trained operators by removing a barrier to entrance. Yet, there are over a half million people who have not found mastering Morse

Code to be a barrier. Indeed, there are many instances of children less than 7 years of age who have mastered Morse Code--and many adults over 60 who decide to become General Class licensees (or higher) and master the code. Over the years, the complaints from those who "just can't learn" the code ring hollow. Rather, the "barrier" represents an unwillingness to spend an iota of energy to learn yet spend a bundle of energy working for the removal of what has now become, with a mere five words per minute requirement, a rather simple exercise in individual initiative.

Many third world countries of the world are not blessed with the economic advantages that we in the United States of America possess. Many an Amateur Radio Operator in third world countries cannot afford a sophisticated piece of radio equipment, but many manage to get on the air with simple transmitters--capable of only keying Morse Code--and simple receivers. With no requirement for Morse Code skills, the promotion of International Goodwill to those very countries where we need to have the greatest interaction will be severely curtailed. We simply must NOT be that shortsighted at this point in world affairs.

--John Scott, K8YC